

## Exhibit 4

AO 106 (Rev. 04/010) Application for Search Warrant

AUTHORIZED AND APPROVED/DATE: 6/3/2020

## UNITED STATES DISTRICT COURT

FILED

WESTERN

for the  
DISTRICT OF

OKLAHOMA

JUN - 3 2020

In the Matter of the Search of )  
 Premises known as: )  
 333246 and 333247 E. 1066 Road, )  
 Lincoln County, McCloud, Oklahoma 74851 )  
 Primary Residence, Secondary Residence, )  
 Tertiary Residence, Conex Style Boxes, )  
 Outbuildings, Vehicles, and Curtilage. )

Case No: M-20-246-SM

CARMELITA REEDER SHINN, CLERK  
 U.S. DIST. COURT, WESTERN DIST. OKLA  
 BY SKS, DEPUTY

## APPLICATION FOR SEARCH WARRANT

I, a federal law enforcement officer or attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A.

Located in the Western District of Oklahoma, there is now concealed:

See Attachment B.

The basis for the search under Fed. R. Crim.P.41(c) is(*check one or more*):

- ☒ evidence of the crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Title 18 U.S.C. § 922(o)(1)

Title 18 U.S.C. § 842(a)(3)

Title 26 U.S.C. § 5861(f)

Possession of Machine Gun

Transport, Ship, Receive, or Distribute  
 Explosive Materials

Unlawful Making of Firearm (Destructive  
 Device)

The application is based on these facts:

See attached Affidavit of Special Agent James A. Anderson, FBI Oklahoma City, which is incorporated by reference herein.

- ☐ Continued on the attached sheet(s).  
☐ Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet(s).

James A. Anderson  
 JAMES A. ANDERSON

SPECIAL AGENT

FEDERAL BUREAU OF INVESTIGATION

Sworn to before me and signed in my presence.

Date: 6/3/2020

City and State: Oklahoma City, Oklahoma



*Judge's signature*

SUZANNE MITCHELL, U.S. Magistrate Judge

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**IN THE MATTER OF THE SEARCH  
OF:**

**333246 AND 333247 EAST 1066 ROAD  
LINCOLN COUNTY  
MCLOUD, OKLAHOMA 74851  
WITH ACCESS AND CONTROL OF  
PRIMARY RESIDENCE,  
SECONDARY RESIDENCE,  
TERTIARY RESIDENCE, CONEX  
STYLE STORAGE CONTAINERS,  
BARN, OUTBUILDINGS, VEHICLES,  
AND CURTILAGE**

Case No. M-20-246-SM

**AFFIDAVIT IN SUPPORT OF A SEARCH WARRANT**

I, James A. Anderson, being duly sworn, do hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since July 20, 1997. I am currently assigned to the Joint Terrorism Task Force of the Oklahoma City field office. As a Special Agent, I investigate violations of federal criminal law.

2. As a Special Agent, I have conducted and participated in a variety of criminal and national security investigations, including investigations associated with foreign counterintelligence, counterterrorism, murder, bank robberies, fugitives, financial crimes, computer crimes, as well as other violent criminal acts.

3. I make this affidavit in support of an application for a search warrant to search the residence of **CHRISTOPHER STEVEN LEDBETTER**, located at 333246 and 333247 East 1066 Road, Lincoln County, McLoud, Oklahoma, 74851, with access and control of the primary residence, secondary residence, tertiary residence, Conex style containers, barn, outbuildings, vehicles, and curtilage (but excluding “Sister’s Residence” as identified in Attachment A) (hereafter referred to as the “SUBJECT PREMISES”), which is described in detail in Attachment A to this affidavit, for the items specified in Attachment B hereto, which constitute evidence of a crime, contraband, and other items illegally possessed—specifically evidence of violations of Title 18, United States Code, Section 922(o)(1), possession of a machine gun; Title 18, United States Code, Section 842(a)(3), transport, ship, receive, or distribute explosive materials; and Title 26, United States Code, Section 5861(f), unlawful making of a firearm (destructive device).

4. The facts in this affidavit are based on knowledge obtained through my direct participation in this investigation, information provided to me by other law enforcement officers, agents, and witnesses, and review of documents and records. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me regarding this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to support the issuance of a search warrant.

#### **FACTS SUPPORTING PROBABLE CAUSE**

5. In March 2020, FBI learned that **CHRISTOPHER STEVEN LEDBETTER** (**LEDBETTER**) might be in possession of a fully automatic Avtomat Kalashnikova (“AK-

47”) style carbine (machine gun).

6. On March 4, 2020, an investigator with the Oklahoma Highway Patrol (OHP) provided FBI with a video that OHP accessed and downloaded from **LEDBETTER**’s publicly accessible Facebook page. The video depicts **LEDBETTER** engaging in military-style tactical training in a partially wooded field. The video is a first-person perspective from a camera mounted on a person’s head. The person recording the video is shooting what appears to be a fully automatic AK-47 style carbine (machine gun). This individual is wearing a tan glove on his left hand and his voice can be heard. As part of this investigation, I have reviewed multiple videos in which **LEDBETTER** can be heard speaking. In some of these videos, **LEDBETTER** is also wearing a tan glove on his left hand. Additionally, **LEDBETTER** is known to wear a tactical helmet with a GoPro-type camera<sup>1</sup> mounted to the front. I believe **LEDBETTER** to be the person shooting the AK-47 and speaking in this video.

7. On April 30, 2020, FBI observed a news article on the Internet titled, *“Protesters turn out at Kansas Capitol Thursday.”* The article, from KMBC News 9 (ABC), dated April 23, 2020, reflected a news story about a group of protesters that showed up at the Capitol Building in Topeka, Kansas, wherein they were protesting recent “stay-at-home” orders issued by the Kansas Governor as a result of the COVID-19 pandemic. In the article, **LEDBETTER** is quoted as stating, “As you can see, I got weapons right on me. I

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<sup>1</sup> GoPro-type cameras are digital cameras that have the ability to store data, which can be transferred to another computer or electronic device for uploading to the Internet.



got illegal weapons on me. But none of them are going to do anything because I'm a peaceful person. Right?" The article also had a video attached to it wherein the local News 9 Reporter was talking with **LEDBETTER**. The video depicts **LEDBETTER** with an AK-47 style carbine, wearing tactical gear, a helmet, and carrying several high-capacity magazines.

8. On May 4, 2020, I observed a video posted on **LEDBETTER**'s publicly accessible Facebook page, dated May 3, 2020 at 2:34 PM, located at URL <https://www.facebook.com/christopher.ledbetter.9>, display name "Christopher Ledbetter," attributed to Facebook Profile ID 100003681487662.<sup>2</sup> The video depicted approximately eight individuals engaged in what appeared to be tactical "room entry" training commonly known as Close Quarters Battle or "CQB." The video appears to be from a camera mounted on the head of an individual. This individual appears to be firing an AK-47 style carbine and is firing in a fully automatic mode. The individual who appeared to be videoing could be heard speaking. Investigating agents familiar with **LEDBETTER** believe that the shooter's voice is **LEDBETTER**'s. Additionally, the person firing the fully automatic firearm has tattoos on his left arm that are consistent with tattoos I have observed on **LEDBETTER** in other photographs and videos. The first paper target, which is shot with full auto, is a silhouette labeled "POLICE" with a badge drawn over the left chest (where a police officer would typically wear his/her badge). The video was also

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<sup>2</sup> Facebook has since removed **LEDBETTER**'s Facebook profile so that it is no longer publicly accessible.

posted on YouTube, entitled “Training,” dated May 4, 2020. That video is attributed to YouTube subscriber “Christopher Ledbetter” and was found at the URL web address:

<https://www.youtube.com/channel/UCb0rdPvyxs3tSK6GrdkrwqA>.

9. On May 22, 2020, FBI observed a publicly accessible YouTube video located at URL: <https://www.youtube.com/watch?v=RrAtwfiPwKY&feature=youtu.be>. The video was dated May 22, 2020, and was titled “Update. Liberty or Death.” It was posted on the YouTube page corresponding to the display name “Christopher Ledbetter” at URL:

<https://www.youtube.com/channel/UCb0rdPvyxs3tSK6GrdkrwqA>. **LEDBETTER** can be seen standing near the McLoud Police Department in McLoud, Oklahoma. He is wearing camouflage pants, a tactical helmet with a mounted camera, and holding an AK-47 style carbine.

10. On May 23, 2020, a Lincoln County Sheriff’s Office (LCSO) Investigator provided FBI Agents information obtained from Facebook in response to a state search warrant obtained in the District Court for the Twenty-Third Judicial District for Lincoln County. The search warrant, signed by a judge on May 4, 2020, was thereafter served on Facebook by the LCSO. The warrant sought certain data (between the period of October 1, 2018 through May 6, 2020) associated with **LEDBETTER**’s Facebook page, Facebook User ID (UID) 100003681487662, found at URL <http://www.facebook.com/christopher.ledbetter.9>. This Facebook account has numerous photos of **LEDBETTER** uploaded by the accountholder, voice messages from the account holder which I believe to be **LEDBETTER**’s voice, and videos posted by the accountholder which depict **LEDBETTER**.



11. FBI located the videos previously described in paragraphs 6 and 8 while reviewing the Facebook search warrant return. The return corroborates that **LEDBETTER** posted the referenced videos.

12. FBI's review of the Facebook return also provided numerous conversations in which **LEDBETTER** discusses fully automatic weapons and explosives. Among other things, investigators observed the following:

- a. The following conversation took place via Facebook Messenger between **LEDBETTER** (UID: 100003681487662) and "FBU 1"<sup>3</sup> from December 29, 2019, at 20:58:57 UTC, to January 1, 2020, at 15:44:44 UTC:

- Author: FBU 1  
Sent: 2019-12-29 20:58:57 UTC  
Body: What are you up to
- Author: FBU 1  
Sent: 2019-12-29 20:59:18 UTC  
Body: It's going
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2019-12-29 20:59:36 UTC  
Body: Just working 😊 maybe make up some nades when I get off work.<sup>4</sup>
- Author: FBU 1  
Sent: 2019-12-29 20:59:48 UTC  
Body: You should

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<sup>3</sup> FBU refers to "Facebook User." Facebook records provide the name of the individuals in the comments and/or messages. Their names are being redacted to protect their identities.

<sup>4</sup> I believe, based on the totality of the conversation and investigation, "nades" refers to grenades.

- Author: FBU 1  
Sent: 2019-12-29 20:59:54 UTC  
Body: Let's play some pubg
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2019-12-29 21:00:35 UTC  
Body: Hell yeah. And for sure I wanna try to make up enough to give out some to everybody riding to VA.
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2019-12-29 21:00:44 UTC  
Body: You sent a photo.  
Attachments: image-577358576375378 (577358576375378)  
Type: image/jpeg  
Size: 44739  
URL: [https://attachment.fbsbx.com/messaging\\_attachment.php?aid=577358576375378&mid=mid.%24cAAACvrNfSN1hLtcO1vU3YIcma42&uid=100003681487662&accid=100003681487662&previous=0&hash=AQAzkKc\\_5bZaSvh6ZrpYlePLBg9MkUcNoHvQeEL7vucBdw](https://attachment.fbsbx.com/messaging_attachment.php?aid=577358576375378&mid=mid.%24cAAACvrNfSN1hLtcO1vU3YIcma42&uid=100003681487662&accid=100003681487662&previous=0&hash=AQAzkKc_5bZaSvh6ZrpYlePLBg9MkUcNoHvQeEL7vucBdw)



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<sup>5</sup> I believe this to be a picture of **LEDBETTER** based on the context of the conversation as well as the tattoo on the left arm of the individual in the photograph. The tattoo is consistent with a known tattoo of **LEDBETTER**.

- Author: FBU 1  
Sent: 2019-12-29 21:00:47 UTC  
Body: He'll yeah
- Author: FBU 1  
Sent: 2019-12-29 21:00:54 UTC  
Body: Smoke or?
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2019-12-29 21:01:25 UTC  
Body: Kinda like the old style myself 😊 nah legit frag grenades bro. Black powder with ammonium nitrate and aluminum powder.
- Author: FBU 1  
Sent: 2019-12-29 21:01:32 UTC  
Body: Fuck yes
- Author: FBU 1  
Sent: 2019-12-29 21:01:49 UTC  
Body: I can help
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2019-12-29 21:03:13 UTC  
Body: I can get the shells for 10 bucks a piece here. Most important is just checking your fuze burn times and making sure you get a good 50 50 of black powder in there to accelerate the AN.<sup>6</sup>
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2019-12-29 21:03:28 UTC  
Body: And you have to weld the bottom closed obviouslu
- Author: FBU 1  
Sent: 2019-12-29 21:05:56 UTC  
Body: I've got a welder

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<sup>6</sup> I believe, based on the totality of the conversation and investigation, "AN" refers to ammonium nitrate.

- Author: FBU 1  
Sent: 2019-12-29 21:18:42 UTC  
Body: The video chat ended.
- Author: FBU 1  
Sent: 2020-01-01 15:44:44 UTC  
Body: Let's fuck shit up

- b. On January 1, 2020 at 00:31:10 UTC, **LEDBETTER** replied to a comment on a post: “[FBU 2] happy new years bro 😊 nah I am but in all seriousness explosives are not forgiving like other mechanical work, so nothing to not test in safe conditions or fuck around with maybes on. Nice to see at least one person on here actually understanding the dangers of incorrect fuzes, you are correct that will kill you. Ah shit look at that my first black market 😊 but yeah be safe man and may the new years have lots of explosions safe for us, not so safe for others 😊”
- c. On January 1, 2020 at 02:07:05 UTC, **LEDBETTER** replied to a comment on a post: “[FBU 3] no yeah I know that's what tannerite has in it I was just saying easier to get it instead of getting those individually – yeah I was looking at ammonium perchlorate since it's close to the explosive speed of TNT but AN with accelerants isn't underpowered enough to make a huge difference for that small of a charge I wouldn't think.”
- d. On January 1, 2020 at 02:13:04 UTC, **LEDBETTER** replied to a comment on a post: “[FBU 3] and obviously putting all of the stable ingredients in and no black powder but just using a blasting cap would be a lot more explosive and

more stable/less likely to turn you to swiss cheese if you happened to take a rifle round to your grenade pouch. Maybe pure ammonium perchlorate or any other better more stable ingredient that can be bought.”

- e. On January 6, 2020 at 15:47:00 UTC, **LEDBETTER** replied to a comment on a post: “I’ll drop a pin on Google maps for you if you want a huge stash, but you’ll have to walk or hitch a ride to another country before going to Iran 😊  
LBV<sup>7</sup> hey man what you see is what you get, I can supply the explosives but not gonna cloth you bro lmao.”
- f. On January 9, 2020 at 18:10:17 UTC, **LEDBETTER** sent the following Facebook message to Facebook username [FBU 4]: “I imagine those shoot smoother than any rifle. I’m trying to make enough grenades to give all the boys some in VA. Ironically those are actually legal until you put the fuze in them, fucking ATF clowns.”
- g. On January 29, 2020 at 17:12:19 UTC, **LEDBETTER** replied to a comment by FBU 5: “legality is no more than whatever some human being in charger’s opinion is at a given time that they write on paper, and then has to be violently enforced to be anything. The point being you can’t care about legalities if you want to fight a gov. And yeah who you think you would have to fight? Does

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<sup>7</sup> I believe, based on the totality of the conversation and investigation, “LBV” refers to a load bearing vest.



Hillary Clinton strap on a rifle and grenades and single handedly take all your freedoms in this confusing fantasy? No, fuck police every single one violates rights by signing up per SOP.<sup>8</sup> And fuck the military too and the rest of the corrupt government. You can't be against and for, unfaithful.”

- h. On February 29, 2020 at 01:30:27 UTC, **LEDBETTER** replied to a comment: “I’m still man enough to use machine guns and explosives here without a cute uniform, roll out and do your job plz.”
- i. On March 3, 2020 at 01:12:41 UTC, **LEDBETTER** sent the following message to FBU 6: “Oh I tested the grenades the other day. Worked very well.”
- j. The following conversation took place via Facebook Messenger between **LEDBETTER** (UID: 100003681487662) and FBU 7 from March 6, 2020 at 22:29:30 UTC to March 7, 2020 at 00:37:28 UTC:

- Author: FBU 7  
Sent: 2020-03-06 22:29:30 UTC  
Body: Not to raise alarms, but those throwable boom apple you mentioned, are you making them like cheap with bottles or like a nice quality one?
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2020-03-07 00:04:54 UTC  
Body: Ah na man just go to any Army surplus store and get actual inert grenades. Thread the hole in the bottom and replace with like 3/8 iron pipe cap. Then many different fillers/fuses or can get small pistol

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<sup>8</sup> I believe, based on the totality of the conversation and investigation, “SOP” refers to standard operating procedure.

primers but have to test them. 12 gauge primers are way too much. But you can get the firing pins cheap and make an actual legit time fuze grenade or just use cannin fuze and a lighter depending on the filler. Really good stuff needs blasting cap.

- Author: FBU 7  
Sent: 2020-03-07 00:06:05 UTC  
Body: Blasting cap?
- Author: FBU 7  
Sent: 2020-03-07 00:06:20 UTC  
Body: Sorry I dont know shit about it
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2020-03-07 00:18:31 UTC  
Body: Only ones I have used so far is just a little black powder mixed with tannerite so it will just ignite with regular firework/cannon fuze. Basically as explosive as a world war 1 grenade. Anything past that is as lethal as you ever need it to be. Blasting cap is just for stable explosives which are usually more high power. Like tannerite, comp B, plastic explosive, all those can be applied to open flame and not explode. They have to have a small cap filled with powder to initiate or mixed with some inside of a closed space.
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2020-03-07 00:19:21 UTC  
Body: But yeah best to just research. Always test fuses and know what you are using beforehand. Explosives are nothing to test first or be unsure about Haha.
- Author: FBU 7  
Sent: 2020-03-07 00:19:53 UTC  
Body: I feel like if i looked it up id get raided tonight lmao
- Author: Christopher Ledbetter (Facebook: 100003681487662)  
Sent: 2020-03-07 00:26:13 UTC  
Body: Na nothing even illegal about that, check out old Army field manuals you can read them online or order the books even. Army Improvised Munitions one 🦋 the tactics manuals are kinda shit but some great medical, explosive, and old SF manuals.
- Author: FBU 7

Sent: 2020-03-07 00:26:45 UTC

Body: I dont remember how we met, but im very thankful

- Author: Christopher Ledbetter (Facebook: 100003681487662)

Sent: 2020-03-07 00:28:29 UTC

Body: 😊 you literally commented on one of my comments on a post "this guy I will boog<sup>9</sup> with". Hahaha hell yeah bro can't keep the goons from finding each other lmao

- Author: FBU 7

Sent: 2020-03-07 00:29:29 UTC

Body: Fuck yes. If it actually kicks off and if everyone gets together, itll be fun as shit till we actually start shooting

- Author: Christopher Ledbetter (Facebook: 100003681487662)

Sent: 2020-03-07 00:31:49 UTC

Body: From my view over here that will be better than waiting to get offed everyday 😊 this transition part is the hardest shit. At least then it is what it is no more maybes. And hey still be a blast while you're getting them just sucks when they get any one of us ha

- Author: FBU 7

Sent: 2020-03-07 00:32:39 UTC

Body: Yeah for sure lmao. Dont guess you've had anymore close calls with the local pd?

- Author: Christopher Ledbetter (Facebook: 100003681487662)

Sent: 2020-03-07 00:37:28 UTC

Body: Situation still going just haven't got to post on here yet for an update. Basically court let him off even though he confessed to felonies and we had five witnesses testify to way more than he would confess to. He has threatened to kill my step brother now and stalking everyone. They sent out sherriffs department last night and all the cops there left like usual cause they all have radios but they talked to his drunk ass just to log it away and do nothing. They did threaten to arrest me for having a gun again and I just told them to go fuck themselves

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<sup>9</sup> I believe, based on the totality of the conversation and investigation, "boog" is short for "boogaloo," which refers to a future civil war.

and I would defend myself as usual. And they cried and fucked themselves lol. They won't stop though it's from the chief down they are out for blood now. Setting up perimeter defenses and steel containers tomorrow.

- k. On March 14, 2020 at 23:54:09 UTC, **LEDBETTER** replied to a comment by FBU 8: “cool excuses, still get fucked. I'll be the one driving without my seatbelt on with a select fire<sup>10</sup> and grenades pussy. You can't make enough money so you rob shit the legal way "for good" instead of the illegal way, motivated by cowardice and laziness nothing more.”
- l. On April 20, 2020 at 18:51:16 UTC, **LEDBETTER** commented on a post: “I keep the select fire and explosives inside cause I'm not a good dick sucking bitch.”
- m. On April 21, 2020 at 03:43:42 UTC, **LEDBETTER** replied to a comment by Facebook username FBU 9: “do it. I like carrying a select fire and grenades just to make sure I'm always illegal lol.”
- n. On April 24, 2020 at 22:15:10 UTC, **LEDBETTER** sent the following message to FBU 10: “Been trying to do all I can and get all the extra guys I can, but it's a losing battle trying to fight for people that won't stand up for themselves or don't want you to. Like here we can run around with automatics and explosives and tell the cops to suck our dicks because they know we will

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<sup>10</sup> Select fire, or selective fire, is a firearm with the capability of firing in multiple modes—typically a semi-automatic mode (one shot per trigger pull) and at least one fully automatic mode (burst or unrestricted).

die for it at this point. But then we have offered shop owners protection to open back up and most of them decline just cause they are scared of breaking the law. If the bend the knee there for this and Duncans family gets fucked more with no protection, they will be getting visited sooner or later by those that are willing to take a stand.”

- o. On May 1, 2020 at 23:38:25 UTC, **LEDBETTER** replied to a comment by FBU 11: “ah I see. Na I've never had an SBR/SMG.<sup>11</sup> Just run a select fire and a few grenades EDC<sup>12</sup> lol.”

13. I caused a search to be conducted of the Bureau of Alcohol, Tobacco, Firearms and Explosive’s (ATF) federal licensing system and determined that **LEDBETTER** does not have the required licenses to: possess a machine gun; transport, ship, receive, or distribute explosive material; or, make a firearm (explosive device).

14. FBI obtained property records for the SUBJECT PREMISES. The land is owned by Joann Ledbetter, a/k/a/ Joann Johnson (Johnson), **LEDBETTER**’s mother. Johnson is listed as an owner of all the buildings/residences on the property in the assessor’s records provided to FBI, with the exception of the residence directly north of the small Conex container and swimming pool shown in Attachment A. This building is shown to be

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<sup>11</sup> I believe, based on the totality of the conversation and investigation, “SBR” refers to a short barrel rifle and “SMG” refers to a submachine gun.

<sup>12</sup> I believe, based on the totality of the conversation and investigation, “EDC” refers to every day carry.



owned by **LEDBETTER**'s sister (labelled as "Sister's Residence" in Attachment A, and excluded from the requested search).

15. A member of the Lincoln County Oklahoma Sheriff's Office responded to the SUBJECT PREMISES on March 5, 2020. Johnson was the reporting party. **LEDBETTER** was also present. The officer does not recall if **LEDBETTER** stated where he was living, but **LEDBETTER** did state that he was staying with his mother.

16. Agents have viewed at least three Conex style metal containers on the SUBJECT PREMISES. These are large, cargo type containers. On March 24, 2020 at 00:31:09 UTC, **LEDBETTER** posted a picture on Facebook of the interior of a Conex style container. The photograph depicts a television and stand, bunkbed, table, locker, generator, and other personal items. Additionally, a light is mounted and illuminated. **LEDBETTER** stated in a comment to the picture that he has "2 40 footer as well this is just the 20 haha." This is consistent with the information known to FBI that two larger and one smaller Conex-style containers are located on the SUBJECT PREMISES. **LEDBETTER** has been seen entering and leaving the smaller of the Conex container (identified in Attachment A) as recently as May 27, 2020.

17. While the Conex container does show sleeping accommodations, it is noted that there is no food visible or bathroom facilities. **LEDBETTER** has been seen entering/accessing the primary residence (identified on Attachment A) as recently as May 27, 2020. FBI believes that the primary residence belongs to his mother, Johnson and his stepfather, Glenn Arthur Gene Johnson. It is therefore believed that **LEDBETTER** is

utilizing the Conex-style containers in addition to other facilities on the SUBJECT PREMISES.

18. **LEDBETTER** has been seen driving at least four vehicles which have been viewed at the SUBJECT PREMISES. The four known vehicles are:

- a. 1993 blue Jeep Wrangler Sport bearing Oklahoma tag EOG780 and registered to **LEDBETTER**;
- b. White Ford Ranger, bearing Oklahoma tag 00097V and registered to Joann Johnson; and
- c. Silver Volkswagen Jetta, bearing Citizen Potawatomi Nation tag 1L971 and registered to Glenn Arthur Johnson.
- d. 2004 Dark Blue/Black Jeep Wrangler, bearing Citizen Potawatomi Nation tag 1R420 and registered to Glenn Arthur Gene Johnson and/or Joann Johnson.

19. On May 19, 2020, **LEDBETTER** was driving the white Ford Ranger. A McCloud Police Officer attempted to stop **LEDBETTER** for purported traffic violations. **LEDBETTER** did not stop for the officer. **LEDBETTER** later posted a video on his YouTube channel filmed from his first person perspective after the officer had initiated his lights and eventually siren. **LEDBETTER** can be heard having a telephone conversation with a person agents believe to be Johnson. During this conversation, **LEDBETTER** stated that he was “driving back home.” Johnson asks, “So, are you home?” **LEDBETTER** responds, “No, I’m almost there.” The pursuit ended at the SUBJECT PREMISES. **LEDBETTER** later tells Johnson to, “Tell Art [stepfather] to get the guns ready...”

**LEDBETTER** can later be seen exiting his truck at the SUBJECT PREMISES, opening the gate, and yelling, “Art, get the fucking weapons.”

20. On May 30, 2020, FBI surveillance observed **LEDBETTER** drive the 1993 blue Jeep Wrangler from the SUBJECT PREMISES to McLoud Police Department (MPD) and exit the vehicle with an AK-47-style carbine. This activity was also identified in publicly available video uploaded to Facebook profile UID 100037015071781 (Display Name: Daniel Chase; Vanity Name: Daniel.chase.98284566).

21. On May 31, 2020, FBI surveillance observed **LEDBETTER** drive the 1993 blue Jeep Wrangler from the SUBJECT PREMISES to a planned demonstration in downtown Oklahoma City and exit the vehicle with an AK-47-style carbine.

22. On June 2, 2020, FBI surveillance observed **LEDBETTER** drive the 1993 blue Jeep Wrangler from the SUBJECT PREMISES to **LEDBETTER**’s work location in Oklahoma City and then to MPD and exit the vehicle with an AK-47-style carbine. This was corroborated by pole camera footage at MPD showing **LEDBETTER** walking around with an AK-47-style carbine. **LEDBETTER** departed MPD and drove back to the SUBJECT PREMISES in the 1993 blue Jeep Wrangler.

23. On June 2, 2020, a video attributed to YouTube subscriber “Christopher Ledbetter” was found at the URL web address: [https://youtu.be/T9c2jKVo\\_ZE](https://youtu.be/T9c2jKVo_ZE). The video, entitled “Battery died, more vids from everyone of all the stuff that happened after,” depicts footage from a camera mounted on an individual’s head. The individual is talking while walking down the street in Tulsa with a group of people. Investigating agents familiar with **LEDBETTER** believe the individual wearing the camera and speaking is **LEDBETTER**.

**LEDBETTER**, referring to one of his associates, states: “He’s being my ammo mule. He’s got about 30 AK mags in that bag. And some of my fireworks.” On May 30, 2020, **LEDBETTER** had travelled to Tulsa and was seen carrying his AK-47-style carbine.

24. As previously discussed, **LEDBETTER** uploads videos from his GoPro-style camera to social media sites such as YouTube and Facebook. Many of these digital cameras require users to utilize a computer to extract the data files from the camera. **LEDBETTER** has not been seen with a computer, nor is one visible in the photographs he posted of the interior of the Conex-style box. Therefore, it is reasonable to believe that **LEDBETTER** is utilizing a computer at the SUBJECT PREMISES.

25. **LEDBETTER**’s Facebook contains photographs of both his mother and stepfather with **LEDBETTER** while he is in possession of his AK-47 style carbine.

26. **LEDBETTER** has posted videos on his YouTube channel in which Johnson is present while he is in possession of his AK-47 style carbine.

27. I believe, based on the totality of the circumstances, including statements made by Johnson, to Johnson, in the presence of Johnson, and photographs and videos taken with **LEDBETTER**, as recent as May 31, 2020, holding is AK-47 style carbine in the presence of Johnson and **LEDBETTER**’s stepfather, it is reasonable to believe and probable cause exists that automatic firearms are located on Johnson’s property with her knowledge.

#### **TECHNICAL TERMS**

28. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. **Wireless telephone:** A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books”; sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.
- b. **Digital camera:** A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard



drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

- c. **Portable media player:** A portable media player (including “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video, or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.
- d. **GPS:** A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on

Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna's latitude, longitude, and sometimes altitude with a high level of precision.

- e. PDA: A personal digital assistant, or PDA, is a handheld electronic device used for storing data (such as names, addresses, appointments or notes) and utilizing computer programs. Some PDAs also function as wireless communication devices and are used to access the Internet and send and receive e-mail. PDAs usually include a memory card or other removable storage media for storing data and a keyboard and/or touch screen for entering data. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can store any digital data. Most PDAs run computer software, giving them many of the same capabilities as personal computers. For example, PDA users can work with word-processing documents, spreadsheets, and presentations. PDAs may also include GPS technology for determining the location of the device.
- f. Tablet: A tablet is a mobile computer, typically larger than a phone yet smaller than a notebook, that is primarily operated by touching the screen. Tablets function as wireless communication devices and can be used to access the Internet through cellular networks, 802.11 "wi-fi" networks, or otherwise. Tablets typically contain programs called apps, which, like programs on a personal computer, perform different functions and save data associated with

those functions. Apps can, for example, permit accessing the Web, sending and receiving e-mail, and participating in Internet social networks.

- g. IP Address: An Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.
- h. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

29. Based on my training, experience, and research, I know that computer devices have capabilities that allow them to serve as a device with all of the aforementioned capabilities. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device, as well as information that might corroborate **LEDBETTER’s** possession of illegal gun(s) and/or explosives. Computer communications software and email messaging

may also give insight into **LEDBETTER's** mindset, intentions and motivations and reveal communications associated with his potential criminal activities. Photographs and videos stored on the digital cameras may reveal evidence of activities conducted by **LEDBETTER** that are associated with his potential criminal activities. These photos and videos may show evidence of planning, premeditation, and the manufacture of explosives and/or the illegal modification of firearms.

30. I also know based on my knowledge, training, and experience that individuals who engage in criminal activity often conduct computer-based online research. Such research can show premeditation and consciousness of guilt. These individuals may also conduct research concerning disposal and/or concealment of evidence. Furthermore, a computer device can record and archive information concerning the nature of the relationship between **LEDBETTER** and his sought-out victim(s) and/or his accomplices. This information will be relevant to understanding his motive for his criminal activities.

#### **ELECTRONIC STORAGE AND FORENSIC ANALYSIS**

31. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, Internet content and application content are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

32. There is probable cause to believe that things that were once stored on the Device may still be stored there, for at least the following reasons:

- a. Based on my knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they

have been downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files downloaded to a storage medium can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person “deletes” a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.

- b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer’s operating system may also keep a record of deleted data in a “swap” or “recovery” file.
- c. Wholly apart from user-generated files, computer storage media—in particular, computers’ internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.



- d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

33. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crime described on the warrant, but also forensic evidence that establishes how the device was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the device because: .

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created.

- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

34. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the devices consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose


many parts of the devices to human inspection in order to determine whether it is evidence described by the warrant.

**CONCLUSION**

35. Based on the above information, there is probable cause to believe that there is evidence, contraband, and other items illegally possessed in violation of federal law and are located at the SUBJECT PREMISES –specifically: Title 18, United States Code, Section 922(o)(1), possession of a machine gun; Title 18, United States Code, Section 842(a)(3), transport, ship, receive, or distribute explosive materials; and Title 26, United States Code, Section 5861(f), unlawful making of a firearm (explosive).

36. Based on the foregoing, I respectfully request that this Court issue a search warrant for the SUBJECT PREMISES, described in Attachment A, authorizing the seizure of the items described in Attachment B.

FURTHER YOUR AFFIANT SAYETH NOT.

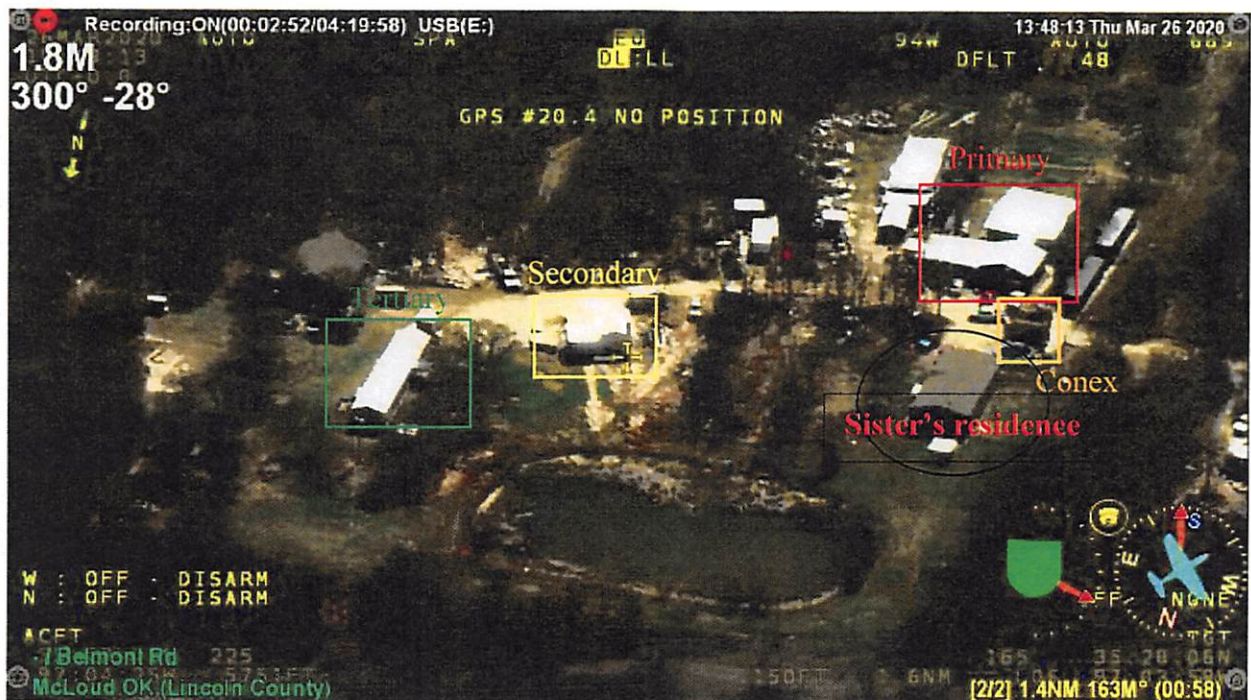
  
James A. Anderson  
Special Agent, FBI Oklahoma City

Sworn to before me this 3d day of June, 2020.

  
SUZANNE MITCHELL  
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT ALocation to be Searched

333246 and 333247 E 1066 Road, McLoud, Lincoln County, Oklahoma, are described as two adjoining 5 Acre parcels located at the eastern end of E 1066 Drive, Location McLoud, Lincoln County Treasurer Parcel ID (0000-35-12N-02E-3-020-00) and (0000-35-12N-02E-3-004-00); 35.468160, -97.0665800. The search includes the real property described in this attachment, as well as the primary residence, secondary residence, tertiary residence, three Conex style storage containers, barn, outbuildings, vehicles, and curtilage. The search does not include sister's residence.



1. The main residence ("Primary") on the property is a single-story, single-family light brown residence, constructed of plywood with a metal roof, according to the county assessment. Just north and connected to the residence by covered walkway is a prefabricated garage or barn with a metal roof.





2. A secondary residence (“Secondary”) on the property is a white single-story, single-family residence that appears from the air to be a prefabricated structure with a metal roof. This structure is not listed as a residence on the county assessor’s parcel sheet and appears to have been added after the assessment.



3. A tertiary residence (“Tertiary”) on the property is a white, or light colored, single wide manufactured home. A covered porch is facing west; and an adjacent shed or storage unit is south of the residence.

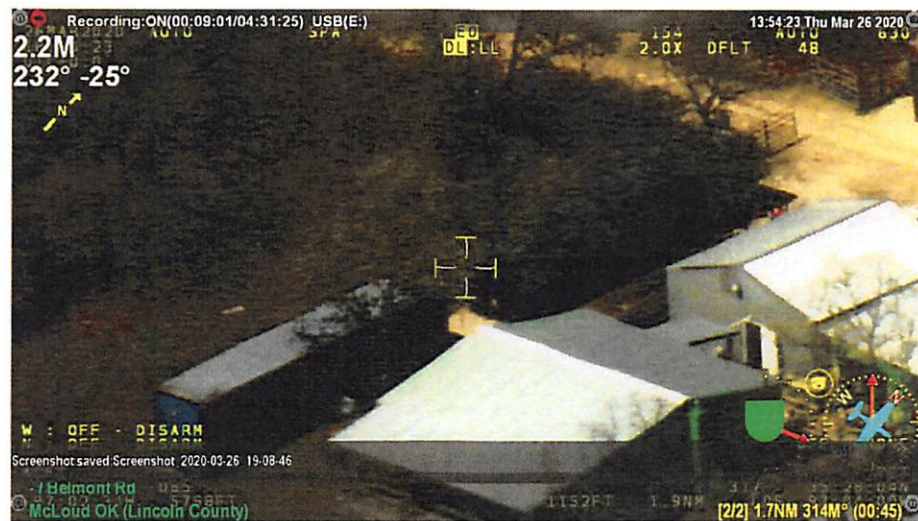


4. The Conex Box (“Conex”) is located at the entrance to the property. As of this writing, the Conex Box is positioned with the front toward the east. The Conex box is a brown colored shipping container, draped in camouflage netting. The top of the Conex box appears to be ringed with sandbags in the form of an elevated firing position.





5. Also included on the curtilage of the primary residence and located throughout the property are numerous pre-fabricated structures and storage units are located throughout both 5 acre parcels. Many of these structures have been added since the most recent county assessment in April 2019. Of note, two large blue shipping containers were added to the property after the 2019 assessment, as was the Conex Box.





**ATTACHMENT B**

**INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

1. Any and all items related to the importing, manufacturing, or dealing in explosive materials, or the distribution of an explosive, destructive device including, but not limited to: computers, routers, modems, tablets, computer peripherals, computer hardware, computer software, electronic storage media, wireless telephones, digital cameras, portable media players, GPS devices, PDAs, and physical notes;
2. Any and all components of explosive or destructive devices to include, but not limited to: grenades, pipes, pipe nipples, endcaps, electrical tape and other adhesives, wiring, tripwires, hand tools, soldering equipment, drills and drill bits, and other electrical components such as silicone rectifiers, transistors, light emitting diodes, switches, power sources to include batteries and capacitors, transmitters, receivers such as wireless phones and personal mobile radios;
3. Any and all explosive materials, fuels, oxidizers, explosive powders (such as black powder and smokeless powders);
4. Any and all records of purchases for the items listed herein Attachment B;
5. Any and all clothing located in the residence which may have evidence of explosive residue or other evidence related to the crime of the making or distributing and explosive device;
6. Any and all firearms and ammunition;
7. Evidence of the purchase, possession, and acquisition of fully automatic firearms;

8. Evidence of the illegal modification of firearms;

9. Evidence of the motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake or accident in the possession of fully automatic weapons, illegal modification of weapons, construction, distribution or manufacturing of explosives or destructive devices. This specifically includes the electronic devices, computers, wireless phones, digital cameras, and other items and areas listed in this Attachment and Warrant.

10. Evidence of others who aided and abetted, counseled, commanded, induced, or procured automatic weapons, components or tools for the illegal modification of weapons, the construction, manufacturing, transportation, and distribution of explosives or destructive devices. This specifically includes the electronic devices, computers, wireless phones, digital cameras and other items and areas listed in this Attachment and Warrant.

11. A search of the electronic devices, computers, cellular/mobile phones, and other items listed in this Attachment and Warrant will include, but not be limited to, a search of, and for, computer passwords, computer pass-phrases, data security devices, records, documents, materials, electronic data, electronic mail, Internet history, geolocation data, chat sessions, mobile applications, sms/mms "text" messages.

12. Electronically stored information on electronic devices, computers, wireless phones, digital cameras, and other items listed in this Attachment and Warrant that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the devices were to be used, the purpose of its use, who would use it, and when.

13. “User attribution” evidence on electronic devices to indicate who has used or controlled the devices and when they were used or accessed.